

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**vs.**

**TERRAFORM LABS PTE LTD. and  
DO HYEONG KWON**

**Defendants.**

**No. 1:23-cv-1346 (JSR)**

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Michael E. Welsh hereby moves this Court for an order for admission to practice *pro hac vice* to appear as counsel for the United States Securities and Exchange Commission in the above-captioned action.

I am a member in good standing of the bar of Massachusetts, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

DATED September 19, 2023

Respectfully submitted,

/s/ Michael E. Welsh

Michael E. Welsh

U.S. Securities and Exchange Commission

351 South West Temple, Suite 6.100

Salt Lake City, Utah 84101-1950

Tel.: (801) 524-5796

Email: welshmi@sec.gov

**CERTIFICATE OF SERVICE**

I certify that on September 19, 2023, I caused a copy of the foregoing Motion for Admission *Pro Hac Vice* to be served by ECF on all parties who have made an ECF appearance.

/s/ Michael E. Welsh  
Michael E. Welsh